Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	**)**	
Revision of the Commission's	**)**	
Rules to Ensure Compatibility	**)**	**CC Docket No. 94-102**
With Enhanced 9-1-1 Emergency	**)**	
Calling Systems	**)**	

REPLY COMMENTS OF THE ComCARE ALLIANCE

Summary

The ComCARE Alliance hereby respectfully submits its reply comments in response to the Commission's Further Notice of Proposed Rulemaking released December 20, 2002 in the above captioned docket. The ComCARE Alliance was heartened to see that, with one or two exceptions, no respondent argued that the Commission should regulate telematics at this time. Many agreed with our assertion that imposing regulation now would be detrimental to public safety. No evidence of threats to public safety from not regulating was presented.

We strongly believe the Commission should take an overall view of emergency communications, not a service-by-service approach. We believe the Commission should be focused on priority initiatives within its jurisdiction that enhance public safety,

especially in this post 9/11 environment. America must upgrade its emergency communications network, focusing on correcting problems of interoperability, modernizing infrastructure and ensuring that our emergency response agencies have both voice and data communications systems that are able to respond to day-to-day and mass emergencies. Presently the best source for "official" information in the fast paced area of homeland security is CNN or other cable news outlets. The attacks on 9/11 underlined the importance of upgrading emergency communications overall, and tying together the tens of thousands of emergency agencies with modern, interoperable information technology.

Upgrading the current 9-1-1 capabilities is an important part of that overall emergency communications effort. The recent Hatfield Report underlined the critical need for upgrading 9-1-1, pointing out the inability of the current systems to handle the demands of new technologies, devices, and applications. NENA is correct that upgrading 9-1-1 is a very large project. The Commission needs to lend its expertise. This project needs to be done in the context of, and coordinated with, homeland security efforts, not on its own.

The primary safety problem regarding telematics today is that most automobile companies are not deploying it. The threat of FCC regulation will create uncertainty and disincentives to deployment. The second major safety problem is continuing gaps in wireless signal coverage.

There are indeed serious issues to be addressed in the policy and technical interface between TSPs and emergency agencies, including PSAPs. Most of these are not problems, but instead opportunities to maximize the value of the next generations of telematics. For several years there has been a significant amount of public/private cooperative work among stakeholder communities regarding these issues. A number of trials are on going or planned. New ideas are being advanced all the time. We see no need for the Commission to write rules; indeed, we think it will be some time before answers are clear.

Whether or not the FCC has jurisdiction, it has never regulated 9-1-1 before. The Commission did not specify the methods of information delivery in wireline or wireless 9-1-1. 9-1-1 has been a state and local matter. We do not believe that the Commission should instruct the more than 6000 PSAPs in this country (or any of the other emergency agencies) how they should receive emergency calls and/or data.

We see no reason for the Commission to regulate 9-1-1 now, and if it does, we respectfully suggest it not start with cars.

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REPLY COMMENTS OF THE ComCARE ALLIANCE

The ComCARE Alliance hereby respectfully submits its reply comments in response to the Commission's Further Notice of Proposed Rulemaking[1] released December 20, 2002 in the above captioned docket.

The ComCARE Alliance is a broad-based, not-for-profit national coalition of more than 90 organizations representing nurses, physicians, emergency medical technicians, 9-1-1 directors, emergency managers, transportation officials, wireless, technology and transportation companies, public safety and health officials, law enforcement, automotive companies, consumer organizations, telematics suppliers, safety groups, and others. "ComCARE" stands for Communications for Coordinated Assistance and Response to Emergencies. Our goal is to promote an integrated, coordinated approach to emergency communications. We are working to encourage the development and deployment of life

[1] In the Matter of Revision of the Commission's Rules to Ensure Compatibility With Enhanced 9-1-1 Emergency Calling Systems, Further Notice of Proposed Rule Making (*FNPRM)*, CC Docket No. 94-102, FCC 02-326 (released December 20, 2002).

saving communications and information technologies that will enhance America's emergency response capabilities. This will save thousands of lives each year, substantially reduce the severity and length of injuries, assist law enforcement and transportation, and enhance homeland security. Perhaps most importantly, we encourage and facilitate cooperation across professional, jurisdictional and geographic lines, seeking to break down the walls that separate these agencies and professions, and thus limit their effectiveness.

ComCARE was heartened to see that, with one or two exceptions, every respondent agreed that Commission regulation of telematics at this time would be unwarranted. Many agreed with our assertion that imposing regulation now would be detrimental to public safety.[2]

We believe the Commission should be focused on priority initiatives within its jurisdiction that enhance public safety. America must upgrade its emergency communications network, focusing on correcting problems of interoperability, modernizing infrastructure and ensuring that our emergency response agencies have both voice and data communications systems that are able to respond to day-to-day and mass emergencies.

[2] See, e.g. Intelligent Transportation Society of America (ITSA) comments at 7. "The Commission should recognize this valuable public safety service being provided by TSPs. Imposing the E911 requirements could have the unintended consequence of causing TSPs to forego the provisioning of safety and security services, resulting ultimately in fewer people receiving location-enhanced emergency assistance than is currently the case (and perhaps also leading to the demise of the industry)".

I. Overall Emergency Communications

1. America must rapidly upgrade its emergency communications networks

America's emergency response agencies need modern integrated emergency communications and information networks that can handle emergencies of all sizes. This is a critical priority to strengthen homeland security, and it will only be accomplished through a collaborative effort including all parties affected (including strong representation and resources from the federal government). We doubt it can be accomplished through government regulation.

Today, America's emergency communications systems are riddled with problems of interoperability, a lack of infrastructure, and a lack of modern technology. The nation's first responder communities very frequently cannot communicate amongst themselves during emergencies, which leads to confusion, the wasting of resources, and delays in response time. At the same time, the holes in wireless coverage across the country and a lack of communications infrastructure have created dangerous gaps in the nation's ability to connect the public to public safety agencies, and public safety agencies with each other. Our nation's first responders are also often relegated to using antiquated communications and information technologies that unnecessarily hinder their efficiency and ability to respond to emergencies.

A key to solving many of these problems is to forge collaborative efforts between public and private groups that work on the deployment of advanced technological solutions that allow for interoperable communications for both voice and data, over a secure, open architecture system. Some organizations and local jurisdictions are working on improvements, but most of these are confined to single areas or single agencies. Instead of dealing with these issues separately, the federal government should be a convener of all the relevant parties, and should provide resources to develop a national plan which addresses America's emergency communications as a whole, and then to implement it. Homeland security concerns call for some national and state level decision-making; we cannot leave all such issues to decisions of the more than 80,000 emergency response agencies. But this does not mean that we should federalize emergency communications and information technologies. We can and should find the right balance between those issues that must be decided at a national level, such as standards, and those over which states and local agencies should have authority.

We thus agree with the suggestion that there is a large national project that must be undertaken[3], and compliment NENA for its leadership in this area. However, we believe the project is much larger than telematics, or even 9-1-1. We note that the President's recently released Homeland Security Presidential Directive (HSPD) 5 fully supports an integrated national system to deal with incidents of all sizes, and directs the Secretary of the Department of Homeland Security to create it.

> The Secretary shall develop, submit for review to the Homeland Security Council, and administer a National Incident Management System (NIMS). This system

[3] See National Emergency Number Association and the National Association of State Nine-One-One Administrators (NENA/NASNA) comments at 4.

> will provide a consistent nationwide approach for Federal, State, and local governments to work effectively and efficiently together to prepare for, respond to, and recover from domestic incidents, regardless of cause, size, or complexity.[4]

The Department of Homeland Security has the responsibility to upgrade emergency communications, and Congress has given it at least some of the necessary resources. That Department should certainly reach out to other agencies. In this regard, the Commission's expertise and participation should be welcomed and encouraged. The Commission is one of several federal agencies with a great deal to contribute, as are the Departments of Transportation[5], Justice and Health and Human Services.

2. Upgrading 9-1-1 must be part of this broader plan to improve America's homeland security

Upgrading PSAPs and America's 9-1-1 system is an integral part of the larger project addressed above, and it is critical to the ability to address emerging technologies. Today there is no national "9-1-1 network", nor are 9-1-1 agencies connected to any national emergency network. Moreover, according to the Hatfield Report and most other sources, the disparate, locally-defined 9-1-1 systems we have generally use technology which serves very well for wireline 9-1-1 calls, but have great difficulty accommodating other services and data.[6]

[4] See Homeland Security Presidential Directive HSPD-5 at ¶ 15.
[5] The Department of Transportation has taken the lead on telematics safety policy issues for more than 6 years.
[6] See Dale N. Hatfield, *A Report on Technical and Operational Issues Impacting the Provision of the Wireless Enhanced 9-1-1 Services* (Hatfield Report).

We agree with those who call for the creation of a "national plan"[7] to address upgrading 9-1-1. We also agree with the call for a "forward looking approach". [8] The Washington State 9-1-1 Program's filing clearly articulates why such a forward-looking approach is vital. It reminds us that,

> To date much of the history of E911 services has been reactionary with the result that the engineering efforts to accommodate the safety needs of the consumer have to a large degree been patches to repair something that was broken. This contrasts with the clear need as articulated in the Hatfield study to support the development of a long term E911 service plan that will accommodate new technologies.[9]

With regard to telematics, there has already been a great deal of forward-looking public/private work to address these issues. Being "forward looking" does not at all have to mean supporting Commission regulation.

Using the important platform it as, the Commission should support a forward looking, national effort that not only ensures the modernization of PSAPs and deals with service integration into this new public safety network, but that is coordinated and connected to the efforts to upgrade America's emergency communications network as a whole, as discussed above. It makes no policy or economic sense to create separate, unconnected 9-1-1 networks, EMS networks, hospital networks, bio-terrorism networks, law enforcement or fire networks, or intelligent transportation systems. We need a collaborative effort of the stakeholders, and substantial public and private resources. We do not see what regulation of car companies will accomplish in this regard.

[7] See NENA/NASNA at 4.
[8] See Association of Public-Safety Communications Officials-International (APCO) comments at 3.
[9] See Washington State 9-1-1 Program comments at 2.

We caution, however, that it would be very hard, if not impossible, for the Commission to lead such a broad national initiative on its own. It is a regulatory body that lacks jurisdiction over most of the relevant parties (including every emergency response organization, starting with PSAPs), and it does not have financial resources that are so critically needed. Instead, we believe the newly formed Department of Homeland Security seems better able to take the federal lead in dealing with these challenges, but it certainly should involve the Commission.

The Commission asked whether the pace of wireless E9-1-1 deployment would be affected by approaches it might take regarding telematics[10]. This is a serious issue as PSAPs representing a majority of Americans have yet to even request Phase II E9-1-1. We commend the Commission for its leadership in recently announcing a public coordination initiative to expedite wireless E9-1-1 deployment.[11] Aside from diverting limited Commission resources, any further burden forced upon PSAP managers at this time can only slow the deployment and implementation of Phase II E9-1-1. Imposing E9-1-1 requirements upon telematics will also slow the growth and development of telematics services among the automakers, which at some point may become a market place motivator to the wireless industry to more rapidly deploy E9-1-1.

II. Telematics

[10] *FNPRM* at ¶ 72.
[11] "*FCC to Launch E911 Coordination Initiative*," Public Notice released March 5, 2003.

1. Telematics provides for enhanced public safety and is doing so without regulation

As we have stated in our previous filings, telematics is the only wireless service that is delivering – nationwide – precise location with emergency calls and, importantly, is providing this information regardless of a PSAP's readiness for Phase I or Phase II under the E9-1-1 rules[12]. This is a significant benefit for public safety and has come about without any federal regulation. Additionally, the TSPs' call centers act to screen emergency calls before they are relayed to PSAPs, reducing the burden on emergency dispatchers. In one way or another, every party that filed in this proceeding endorsed the public safety value of telematics[13]. No party argued or provided evidence that, in the absence of Commission regulation, telematics presents some sort of safety threat.

2. The biggest safety concerns in telematics are lack of deployment and cell phone coverage

As the parties apparently agree that telematics systems provide an important public safety benefit, we suggest the Commission should focus its attention on those issues that are most likely to hinder this benefit. These are the gaps in continuous cell phone coverage nationwide, and the lack of deployment of telematics systems by automobile companies. These two issues are real public safety concerns, and should therefore be the primary focus of the Commission if it wishes to be active in telematics.

[12] See ComCARE Alliance comments at 28.
[13] See, e.g., ITSA comments at 7, American Automobile Association (AAA) comments at 5.

3. The possibility or imposition of telematics regulation at this time will provide disincentives for the further deployment of telematics devices

Every organization with knowledge of the economics of telematics that filed in this proceeding agreed that regulation of telematics, or even serious discussion of it, would be detrimental to public safety by providing material and immediate disincentives to further deployment of this technology, particularly while it is in its infancy.[14] The primary issue facing companies which have not yet deployed telematics is how to amortize the costs. Adding new costs, for example through imposing specific 9-1-1 connection rules, or staff training, can only have one effect. The greatest problem is uncertainty of costs during the invariably length debates which surround regulatory proposals. Interestingly, no party said that regulation would either increase telematics deployment, or not discourage it.

4. Regulation by the FCC at this time would be unwarranted as the public and private sectors are actively addressing the issues.

In addition to the detrimental effect it will have on the further deployment of telematics devices, regulation by the Commission would also be unwarranted. No party presented evidence, anecdotal or otherwise, of a public policy problem that is creating a safety problem, much less one that is occurring due to the absence of Commission regulation. On the contrary, the automotive and telematics industries have been working collaboratively with safety organizations of all kinds for more than three years to address

[14] See ITSA comments at 5; Association of International Automobile Manufacturers (AIAM) comments at 2, Mercedes-Benz USA comments at 2, OnStar Corporation comments at ii.

all the issues that the Commission raised in its questions and more. Given our membership, which includes both emergency response organizations and the telematics industry, we have been privileged to play a role in a number of these efforts. The imposition of federal mandates would only serve to complicate issues that companies and organizations are already working to resolve.

For example, the ACN Subcommittee of the NENA Non-Traditional Communications Committee is currently reviewing four different methods for connecting a TSP to the relevant PSAP in the event of a 9-1-1 emergency. The Subcommittee debated a long discussion document on these topics[15] at the NENA Technical Development Conference in Orlando, FL, March 16-19, 2003. An appointed group of the Subcommittee has undertaken a formal scoring of four specific alternatives, using the criteria of the NENA Future Path Plan (FPP).[16]

For more than three years, ComCARE has had one or more committees that are actively engaged in addressing the specific telematics issues raised by the Commission's Notice. Our broader efforts to upgrade emergency communications invariably include a telematics component. APCO has worked with ComCARE and ATX to implement emergency training programs for TSP staff.

We are extremely pleased that the XML Vehicular Emergency Data Set (the creation of which ComCARE facilitated), is being used by a variety of technology companies in field trials, and

[15] NENA Technical Information Document On Automatic Collision Notification And Telematics.
[16] According to NENA, the FPP was developed by leading experts from the 9-1-1, telematics, and telephone industries, working cooperatively to define the most feasible, efficacious migration path from the present to the voice/data delivery system envisioned for the future.

OnStar has committed to employing it. That project's subcommittees were chaired by the Chair of NENA's Data Committee, an emergency physician who is the data standards leader for the National Association of EMS Physicians and the National Association of State EMS Directors, and a top OnStar engineer. More than 20 organizations participated. The effort was not initiated due to regulatory pressure or a fear of regulation. Instead OnStar agreed to provide telematics emergency data to emergency response agencies, but requested a standardization of it.

5. A variety of field tests are underway

A wide variety of field tests are underway. In our initial filing we described the Greater Harris County trial of telematics with police cars, the Shenandoah County, Virginia effort in which ComCARE is involved, an initiative led by the Department of Transportation in Minnesota, and others. We did not discuss three other efforts by our members.

a. Remote Conference Calling Field Test

One of the four methods of TSP/PSAP communications being evaluated by the NENA ACN Subcommittee was field tested in New Jersey two years ago. One of ComCARE's members demonstrated an effective method of quickly and reliably connecting a TSP to the PSAP with jurisdiction over the location of the vehicle. The method used the existing, local E9-1-1 network to make the connection, implementing it via an existing feature offered ubiquitously by almost every wireless carrier called Three-Way Calling. A collision was simulated, causing an ACN call to be placed automatically to a surrogate TSP. When it was determined that 9-1-1 was

needed, a signal was then sent back from the TSP to the ACN controller in the vehicle, causing it to set up a Three-Way Call, dialing "9-1-1" to conference in the local PSAP. Since 9-1-1 was dialed from the vehicle, the third party call was automatically routed to the vehicle's local PSAP over the existing, local E9-1-1 network. The resulting three-way call interconnected the TSP, the occupants of the vehicle, and the PSAP in a high-level, carrier-quality conference connection.

b. OnStar Proposal

Just this month, OnStar submitted a detailed plan to NENA's ACN Subcommittee at the NENA Technical Development Conference. The OnStar plan proposes to use wireless E9-1-1 infrastructure for telematics voice and data delivery, thus avoiding a second set of costs for an independent information delivery infrastructure for either PSAPs or TSPs. The plan would present latitude, longitude and call back number to PSAPs in the same way as it is done by PSAPs for Phase II wireless calls. At the same time, using the standard vehicular emergency XML data set, OnStar is preparing to provide additional crash data to a variety of other authorized emergency agencies, such as hospitals, using modern packet switching protocols and methods.

c. University of Virginia Smallpox Drill

ComCARE and a number of its members recently provided the emergency data and video communications systems to support a regional bio-terrorism drill in 25 counties of western Virginia. In this drill, we not only simulated a multi-state smallpox outbreak, but

we also simulated an accident involving an OnStar-equipped vehicle which blocked an Interstate, creating a terrorist threat to hazardous materials trucks stopped behind the crash. The OnStar crash data was immediately transmitted to the PSAP, the hospital, and law enforcement. Later a hazardous materials truck equipped with a Qualcomm tracking device was hijacked and driven towards a nuclear power plant. In all of these events, messages were shared in real time with emergency personnel, demonstrating how using open systems and open architecture, America's emergency communications systems can be flexible enough to handle all events from a routine incident to the mass emergency. This successful drill demonstrated a collaborative effort of private companies working with each other, as well as local, state, and federal emergency agencies.

6. Specific suggestions for FCC regulation of 9-1-1 are inappropriate

We respectfully disagree with the portion of the Nextel filing that suggests that telematics emergency calls should be directly routed to PSAPs.[17] We explained our reasons in detail in our Comments.[18] As Intrado states in its Comments: "Call Centers provide a valuable function of triaging emergency calls and filtering events that do not require public safety engagement".[19]

We believe consensus exists in the emergency response community that soundly rejects the proposition that telematics Mayday and ACN calls should be automatically delivered to PSAPs or medical responders today.

[17] See Nextel Communications, Inc. comments at 15.
[18] See ComCARE Alliance comments at 37.
[19] See Intrado comments at 9.

We also respectfully disagree with the Boulder Regional Emergency Telephone Service Authority's (BRETSA) suggestion that the Commission should require routing of all emergency calls via 911 trunks.[20] First, we do not believe that the Commission should instruct the more than 6000 PSAPs in this country (or any of the other emergency agencies) how, and from whom, they should receive emergency calls and data.[21] Our work around the country has taught us that emergency agencies have widely diverging technical capabilities and informational interests. While some communities may find the solution proposed by BRETSA to be the best option, we believe that a federally-mandated standard of this kind would not serve the interests of the diverse range of public safety agencies across the country. Mandating what information should be delivered and how emergency agencies should receive it overrides the opinions of state and local jurisdictions, which are best suited to make such decisions. Modern communications and information technologies (particularly packet switching and XML) allow jurisdictions to make their own decisions, while still participating in a nationally interoperable system. There is no need to create a one-size-fits-all solution.[22]

The second problem with this suggestion is that BRETSA assumes the current 9-1-1 network will stay as it is, while most everyone argues (as we advocate above) that it should evolve rapidly to a new kind of network where the current limitations on voice

[20] See Boulder Regional Emergency Telephone Service Authority (BRETSA) comments at 6.
[21] Beyond this policy question, we are not aware that the Commission has ever asserted jurisdiction over PSAP practices.
[22] BRETSA argues that its solutions should apply to all devices or services that are either interconnected to the PSTN, connected with a dispatch or service center that is interconnected, or are intended or reasonably expected to be used for the transmission of alarms or information to initiate a response by public safety agencies. see *BRETSA*, at 3. This would include not only telematics, but also the much larger, and more false alarm prone burglar alarm industry.

switching and data would not apply. Third, it is still far too early to settle on a single method of voice and data delivery, much less to require it by regulation. Fourth, we note that the FCC did not regulate such issues in wireline or wireless 9-1-1 for carriers, much less emergency agencies. Why would the Commission begin now with automobiles?

We also disagree with BRETSA's assertion that TSP call center employees lack the required training to deal with emergency calls[23]. The NMRI participant organizations approved a new training standard for TSP employees[24]. After NMRI, ComCARE gave APCO a grant to develop a course for that purpose. Since then APCO has been working with telematics providers, particularly ATX, to deliver exactly that training. Although it cites no evidence of problems with the current system, BRETSA proposes to add delay to every single emergency call by transferring all of them from TSPs to another private call center where a second commercial operator will ask questions before transferring the call to 9-1-1 or a public dispatcher. This suggestion should be rejected out of hand.

Whatever one thinks of the policy benefits of training TSP or PSAP staff, or setting operational rules for the receipt and handling of emergency calls and data, there is no current precedent for any federal standard for either of them. Indeed, there are no state standards in many states. Where staff training standards do exist for PSAPs themselves, they vary widely from state to state. We respectfully submit that if personnel training for emergency call-takers is really an issue for the federal government to resolve, TSPs' call-centers should not be the first place to start. Even if they are, the Commission should

[23] See BRETSA at 6-7.
[24] See National Mayday Readiness Initiative (NMRI) Final Recommendations at 14-15.

probably not be the agency to make any such decisions. The Commission's proper role should be to support collaborative public/private efforts to solve the issues raised by BRETSA, just as the participants in the cooperative process of NMRI and follow on activities have sought to do. We repeat our invitation for the Commission's staff to participate in any of our meetings and initiatives on these issues.

We are not aware that any federal agency has placed any communications standard of any kind on PSAPs in America. Despite the clear and powerful commitment of the FCC to automatic location of wireless 9-1-1 callers, Docket 94-102 imposed no requirement on PSAPs to request enhanced 9-1-1 from wireless carriers, nor does it specify in any way how they must receive and use the information. In the contentious battles about CAS and NCAS, the Commission did not express an opinion. Even in the extremely controversial arguments over location technologies to be used by carriers, where the Commission clearly had jurisdiction, it arguably weakened the initial E9-1-1 Phase II rules because it felt very strongly that it should favor "technology neutrality."

Similarly, when Congress passed the 9-1-1 law it imposed absolutely no requirements on PSAPs. The Congressional Budget Office statement in the Committee Reports for that legislation makes clear that the only requirements of the law fell on wireless carriers to connect those consumers who dial 9-1-1 to emergency services.[25] From a policy and regulatory perspective, we respectfully suggest there is little difference between a

[25] See "Report of the Committee on Commerce, Science, and Transportation on S. 800", The Wireless Communications and Public Safety Act of 1999, 8/4/99 at 4. Under the section *Other Impacts* the Congressional Budget Office stated that, "Because the FCC's authority over 911 service is limited to private carriers, not state and local governments, CBO believes it is unlikely that this section would result in an intergovernmental mandate".

communication to public safety agencies from (a) a home security central station reporting a fire, break in, or the like, (b) a Mayday/ACN emergency call from an OnStar or ATX, (c) a hazmat communication from a QUALCOMM or Delphi, or (d) a homeland security alert from a federal agency. We do not think the FCC should seek to regulate any of these communications or any party to them, public or private.

7. Even if the Commission has jurisdiction it should not exercise it

Some of the parties assert that the Commission may be able to assert jurisdiction over some or all of the issues, and some or all of the parties involved in telematics. Others strongly disagree. Other than our belief that the 9-1-1 law did not confer that jurisdiction on the Commission, we express no opinion on this issue. But we believe it is irrelevant. The critical issue now is deployment of telematics, and the key issue affecting that is whether the Commission might exercise any jurisdiction it might have in the near or medium term.

Other than BRETSA and Nextel, we do not read the comments of any party to advocate that the Commission intervene now or any time soon to regulate telematics. Nor has any party, including BRETSA, presented the Commission with any evidence that public safety will be improved if it intervened regarding telematics. Accordingly we respectfully suggest that the Commission explicitly renounce any intention of regulating telematics, except when services with a direct connection to the PSTN (and thus 9-1-1) are offered.

III. Non-Telematics Issues

ComCARE strongly supports efforts to bring E9-1-1 to users of PBX systems. This is a long standing problem, raised years ago at the same time as wireless 9-1-1 by NENA and APCO. The time has come to resolve it.

Similarly, we join with others in advocating E9-1-1 solutions for Voice over Internet Protocol devices before they become ubiquitous. In that regard, we note the pioneering work of Professor Schulzrinne of Columbia University in seeking E9-1-1 solutions for VoIP devices. An article describing his ideas was previously filed in this proceeding.[26]

Respectfully submitted,

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Dated: March 25, 2003

[26] See Henning Schulzrinne, February 28, 2003, 10-11, referring in part to the ComCARE EPAD proposal.